

Scott M. Riemer (SR5005)
RIEMER & ASSOCIATES LLC
Attorneys for Plaintiff
60 East 42nd Street, Suite 2430
New York, New York 10165
(212) 297-0700 (phone)
(212) 297-0730 (fax)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JOSEPH RADOSTI,

Plaintiff,

O8 CV 4973 (AKH)(GWG)

-against-

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

METROPOLITAN LIFE INSURANCE
COMPANY; and CITIGROUP LONG TERM
DISABILITY PLAN,

Defendants.
-----X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Scott M. Riemer, a member in good standing
of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

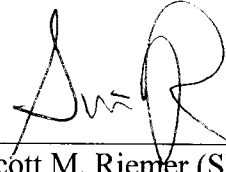
Applicant's Name: Pamela I. Atkins
Firm Name: Atkins & Associates, LLC
Address: 1117 Perimeter Center West, Suite W405
City/State/Zip: Atlanta, Georgia 30338
Phone Number: (770) 399-9999
Fax Number: (770) 399-9939

PAMELA I. ATKINS, ESQ. is a member in good standing of the Bar of the States of
Georgia and Maryland, as well as the District of Columbia.

There are no pending disciplinary proceedings against PAMELA I. ATKINS, ESQ. in any State or Federal court.

Dated: New York, New York
July 11, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Riemer', is written over a horizontal line.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOSEPH RADOSTI

Plaintiff,

-against-

O8 CV 4973 (AKH)(GWG)

**AFFIDAVIT OF
SCOTT M. RIEMER
IN SUPPORT OF MOTION TO
ADMIT COUNSEL
*PRO HAC VICE***

METROPOLITAN LIFE INSURANCE
COMPANY; and CITIGROUP LONG TERM
DISABILITY PLAN

Defendants.

-----X

State of New York)
)
County of New York) ss:

SCOTT M. RIEMER, being duly sworn, deposes and says as follows:

1. I am a member of Riemer & Associates LLC, counsel for plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Pamela I. Atkins, Esq. as counsel *pro hac vice* to represent plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1984. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
3. I have known Pamela I. Atkins since 2003.
4. Ms. Atkins is a member of Atkins & Associates, LLC in Atlanta, Georgia.

5. I have found Ms. Atkins to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

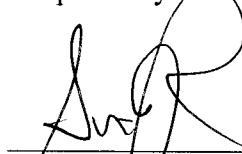
6. Accordingly, I am pleased to move the admission of Pamela I. Atkins, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Pamela I. Atkins, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Pamela I. Atkins, *pro hac vice*, to represent plaintiff in the above captioned matter, be granted.

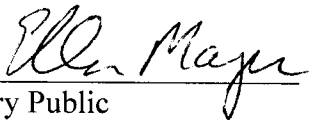
Dated: New York, New York
July 11, 2008

Respectfully submitted,



Scott M. Riemer (SR5005)
RIEMER & ASSOCIATES LLC
Attorneys for Plaintiff
60 East 42nd Street, Suite 2430
New York, New York 10165
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(212) 297-0730 (fax)

Sworn to before me this ^{or} 11 day of July, 2008



Notary Public

ELLEN R. MAYER
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01MA6063944
QUALIFIED IN WESTCHESTER COUNTY
TERM EXPIRES SEPTEMBER 10, 2009

2009



**Supreme Court
State of Georgia**

STATE JUDICIAL BUILDING

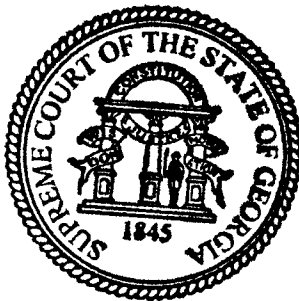
Atlanta 30334

LEAH WARD SEARS, CHIEF JUSTICE
CAROL W. HUNSTEIN, PRESIDING JUSTICE
ROBERT BENHAM
GEORGE H. CARLEY
HUGH P. THOMPSON
P. HARRIS HINES
HAROLD D. MELTON
JUSTICES

THERESE S. BARNES, CLERK
JEAN RUSKELL, REPORTER

June 18, 2008

I hereby certify that Pamela Ilene Atkins, Esq., was admitted on the sixth day of December, 1993, as a member of the bar of the Supreme Court of Georgia, the highest court of this State; and, since that date she has been and is now a member of this bar in good standing, as appears from the records and files in this office.

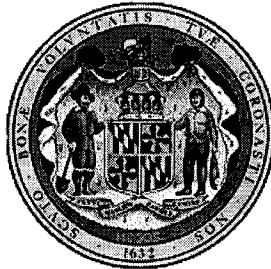


Witness my signature and the seal of this Court hereto
affixed the day and year first above written.

Therese S. Barnes

Deputy Clerk, Supreme Court of Georgia

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the fifteenth day of December, 1992,*

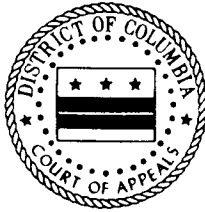
Pamela Ilene Atkins

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twenty-fifth day of June, 2008.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

PAMELA I. ATKINS FRANCISCO

was on the 2ND day of OCTOBER, 1995
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on June
25, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JOSEPH RADOSTI,

Plaintiff,

O8 CV 4973 (AKH)(GWG)

-against-

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN SUBMISSION**

METROPOLITAN LIFE INSURANCE
COMPANY; and CITIGROUP LONG TERM
DISABILITY PLAN,

Defendants.
-----X

Upon the motion of Scott M. Riemer, attorney for Joseph Radosti, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Pamela I. Atkins
Firm Name:	Atkins & Associates, LLC
Address:	1117 Perimeter Center West, Suite W405
City/State/Zip:	Atlanta, Georgia 30338
Phone Number:	(770) 399-9999
Fax Number:	(770) 399-9939

is admitted to practice *pro hac vice* as counsel for Joseph Radosit in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,

counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
July 11, 2008

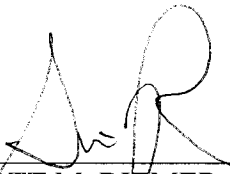
United States District/Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that I am attorney for Plaintiff and that on July 11, 2008, I caused to be served by first class mail a true and correct copy of Motion to Admit Counsel Pro Hac Vice, an Affirmation from Scott M. Riemer, a certificate of Good Standing from Supreme Court of Georgia, a certificate of Good Standing from the Court of Appeals of Maryland, a certificate of Admission and Good Standing from the District of Columbia Court of Appeals, proposed Order for Admission Pro Hac Vice on Written Motion, to the following:

TO: Randi F. Knepper, Esq.
Counsel for defendant Metropolitan Life Insurance Company
McElroy, Deutsch, Mulvaney & Carpenter, LLP
1300 Mt. Kemble Avenue
P.O. Box 2075
Morristown NJ 07962-2075

Dated: New York, New York
July 11, 2008



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